

EXHIBIT 1

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT 2

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EXHIBIT 3

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

BRIDGESTONE SPORTS CO., LTD., and
BRIDGESTONE GOLF, INC.,

Plaintiffs,

v.

ACUSHNET COMPANY,

Defendant.

Case No. 05-CA-132 (JJF)

ACUSHNET COMPANY,

Counterclaimant,

v.

BRIDGESTONE SPORTS CO., LTD., and
BRIDGESTONE GOLF, INC.,

Counterdefendant.

DECLARATION OF BRIAN S. SEAL

1. My name is Brian S. Seal, and I am an associate at the law firm of Howrey LLP.
2. Howrey LLP represents the defendant and counterclaimant Acushnet Company ("Acushnet"). I make this declaration in support of Acushnet's Opposition to Bridgestone's Motion for Sanctions.
3. Acushnet produced its core recipe information, including manufacturing guidelines, documents from its recipe change databases and change notices in its initial document production in August 2005. It supplemented that production several times during the course of the litigation as it became aware of additional recipe changes and to keep the information current. The majority of the recipe changes about which

Bridgestone complains were produced by November 2006, in advance of the parties' agreed-upon December 18, 2006 date for the close of fact discovery.

4. When Bridgestone's counsel requested documents from Acushnet's Mesabi database, I informed them that the information was highly burdensome to collect and was duplicative of the information produced by Acushnet. From the outset, Bridgestone rejected Acushnet's representation that the information in Mesabi was duplicative of the recipe change notices. Although both recipe change notices and the Mesabi data can be used to determine core formulations, the Mesabi information is easier to use for this purpose. This fact was recognized by both Acushnet and Bridgestone. The dispute with respect to production centered on the difficulty in extracting the information out of Mesabi.

5. During meet-and-confers with Bridgestone's counsel in September and November 2006, and again in January 2007, I offered to make Acushnet's Mesabi system available to Bridgestone for inspection. Bridgestone declined those offers.

6. On January 31, 2007, in response to arguments made by Bridgestone's experts, Acushnet obtained a letter from Sartomer Company disclosing the maximum purity of ZDA powder. This letter was not in the possession, custody or control of Acushnet during fact discovery. It was obtained in rebuttal to arguments made for the first time in Bridgestone's expert reports.

7. Dr. Felker, Acushnet's non-infringement expert, requested counsel to inquire into the purity of ZDA powder, after reading Bridgestone's infringement report from Mr. Cadorniga, in which Mr. Cadorniga attempted to use actual purity information in determining the parts per hundred of the ingredients used in the golf ball cores.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 3, 2007



Brian S. Seal

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EXHIBIT 4

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EXHIBIT 5

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EXHIBIT 6

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EXHIBIT 7

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Leslie A. Polizoti

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May 18, 2006
520990

ATTACHMENT A

Notwithstanding any definition set forth below, each word, term, or phrase used in this Notice of Deposition is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

DEFINITIONS

As used herein, the following terms are to be interpreted in accordance with the DEFINITIONS set forth in Bridgestone's First Set of Requests For Production of Documents and Things (Request Nos. 1-100) as though fully set forth herein.

In addition, the following phrase in this Notice is to be interpreted in accordance with the following definition:

37. The phrase "Related Patents or Applications" means any patents or patent applications, whether issued, pending, abandoned, or otherwise, related to a patent, including any parents, continuations, continuations-in-part, divisions, provisionals, reexaminations, reissues, and foreign counterparts.

MATTERS ON WHICH EXAMINATION IS REQUESTED

1. The conception, reduction to practice, diligence up to reduction to practice and other development activities or alleged inventive activities for the subject matter of the '705 patent including the claims of the '705 patent.

2. The preparation, filing and prosecution of the application which resulted in the issuance of the '705 patent and its Related Patents or Applications.

CERTIFICATE OF SERVICE

I, Leslie A. Polizoti, hereby certify that on May 18, 2006 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Richard L. Horowitz, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th floor
1313 N. Market Street
Wilmington, DE 19801

and that I caused copies to be served on May 18, 2006 upon the following in the manner indicated:

BY HAND

Richard L. Horowitz, Esquire
Potter Anderson & Corroon LLP
1313 N. Market Street
Wilmington, DE 19801

BY FACSIMILE

Alan M. Grimaldi, Esquire
Howrey LLP
1299 Pennsylvania Avenue, NW
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/s/ Leslie A. Polizoti
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EXHIBIT 8

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EXHIBIT 9

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EXHIBIT 10

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EXHIBIT 11

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EXHIBIT 12

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